

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SAMANTHA JENKINS, EDWARD BROWN,)	
KEILEE FANT, BYEON WELLS, MELDON)	
MOFFIT, ALLISON NELSON, HERBERT)	
NELSON, JR., and TONYA DEBERRY, <i>et al.</i> ,)	
)	Case No.: 4:15-CV-00252-CEJ
Plaintiffs,)	
)	
v.)	
)	
THE CITY OF JENNINGS,)	
)	
Defendant.)	

JOINT STATUS REPORT AND MOTION TO
STAY ALL PROCEEDINGS FOR AN ADDITIONAL 90 DAYS

Defendant The City of Jennings (“Defendant”), by and through counsel, and Plaintiff Samantha Jenkins, Edward Brown, Keilee Fant, Byeon Wells, Meldon Moffitt, Allison Nelson, Herbert Nelson, Jr., and Tonya DeBerry (“Plaintiffs”), by and through counsel, hereby file this Joint Status Report and Motion to Stay all Proceedings for an Additional 90 Days until March 28, 2016, and state:

1. On March 27, 2015, the Court granted the Parties’ Joint Motion to Stay all Proceedings until June 29, 2015 so the Parties could attempt to negotiate a reasonable resolution of Plaintiffs’ claims to bring an end to this litigation. The Court also requested that the Parties file a Joint Status Report on June 29, 2015 (Doc. No. 9). On June 29, 2015, the Parties filed a Joint Status Report and Motion to Stay All Proceedings for an Additional 90 Days (Doc. No. 11). On June 30, 2015, the Court granted the Joint Motion to Stay All Proceedings until September 29, 2015 and requested the Parties to file a Joint Status Report by September 29, 2015 (Doc. No. 12). On September 28, 2015, the Parties filed a Joint Status Report and Motion to

Stay All Proceeds for an Additional 90 Days (Doc. No. 18). On October 1, 2015, the Court granted the Joint Motion to Stay All Proceedings until December 28, 2015 (Doc. No. 19).

2. Counsel for the Defendant and counsel for the Plaintiffs have continued to negotiate the request for damages made by the Plaintiffs on behalf of themselves and the class. A mediation of the claims for damages has been scheduled on Friday, January 15, 2016 with Richard P. Sher. The Parties believe that the claim for damages may be resolved in the mediation on January 15, 2016. The Parties request the Court to extend the stay of this case for an additional ninety (90) days so that the Parties can engage in negotiations in an attempt to resolve the damage claims of the Plaintiffs and the class.

3. This request by the Parties to stay these proceedings for an additional ninety (90) days is not made for the purpose of vexation or to delay this matter, but to allow the Parties to engage in negotiations in an attempt to resolve the claims for damages in the Class Action Complaint without engaging in time-consuming litigation for which the Plaintiffs and Defendant will incur substantial legal fees and expenses.

4. The undersigned counsel respectfully request the Court to schedule a hearing on this Joint Status Report and Motion to Stay this Case for an Additional 90 Days if the Court desires additional information from the Parties concerning the report and the motion for a stay of the proceedings.

WHEREFORE, Defendant and the Plaintiffs respectfully request the Court to enter an Order granting the Joint Motion to Stay all Proceedings in this Case for an Additional 90 Days until March 28, 2016.

Respectfully submitted,

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